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Presented on behalf of Plaintiffs and  
Class Members

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

**PEOPLE OF LOS ANGELES  
COUNTY WHO ARE BEING  
PENALLY CONFINED IN PRE-  
TRIAL DETENTION BECAUSE OF  
AND DEPENDENT ON THEIR  
INABILITY TO PAY BAIL, BY  
MARK MUNOZ,, *etc.*,**

Plaintiffs,

v.

**ALEJANDRO VILLANUEVA, *et al.*,**

Defendants.

2:22-cv-02538-DMG(JEMx)

[Proposed]  
**PRELIMINARY INJUNCTION**

Judge Dolly M. Gee

**IT HEREBY IS ORDERED, ADJUDGED, AND DECREED** as follows:

1. Defendants' pretrial detention of plaintiffs and class members who cannot afford to pay bail is unconstitutional, *Buffin v. City and County of San Francisco*, 23 F.4th 951, 954, 956 (9th Cir. Jan. 13, 2022); 2019 WL 1017537, \*24 (N.D.Cal. 2019); *In re Humphrey*, 11 Cal.5th 135, 143 (2021); *In re Brown*, 76 Cal.App. 5th 296, \*1 (March 14, 2022).

2. The court hereby preliminarily prohibits defendants and their employees, agents, assigns, subalterns, factotums, and all those working for or with them or at their direction, as well as all persons to whose attention this preliminary injunction

1 comes, from continuing to hold and not releasing plaintiffs and class members  
2 who cannot afford to pay bail;

3 3. Defendants are prohibited from accepting into their custody from any  
4 source any prisoner who is held on bail and who cannot afford to pay bail; and,

5 4. Disobedience of this order will constitute a contempt of court.

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7 Dated: August \_\_, 2022.

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**DOLLY M. GEE**  
United States District Judge